

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 29**

AMAZON.COM SERVICES LLC,)	
)	
Employer,)	
)	
and)	Case No. 29-RC-288020
)	
AMAZON LABOR UNION,)	
)	
Petitioner.)	

**AMAZON.COM SERVICES LLC’S MOTION FOR
EXTENSION OF TIME TO FILE OFFER OF PROOF**

Pursuant to Sections 102.2(c) and 102.69(a)(8) of the National Labor Relations Board’s Rules & Regulations, Amazon.com Services LLC, (“Amazon” or the “Company”), respectfully requests its deadline for submitting its offer of proof in support of its timely objections be extended for good cause, and in support of its request states the following:

1. Amazon is timely filing objections to the election in above-captioned matter.
2. The election in this matter was one of the largest in the Board’s recent history. Amazon’s objections are anticipated to be substantial, both in the number of objections and the scope of the conduct to which the Company plans to object.
3. Amazon requires additional time to further compile, review and outline evidence to support, among others, its objections that: Petitioner threatened employees to coerce them into voting yes; Petitioner electioneered and interfered with employees waiting in line to vote; voter turnout was significantly depressed by the manner in which the Region conducted the first polling period, and all subsequent polling periods, which resulted in inordinately long waits; specific ALU agents loitered or gave the impression of being present, in the immediate vicinity of the polling area intimidating voters and would-be voters; (b) (6), (b) (7)(C) and other ALU

(b) (6), (b) (7)(C) threatened voters; Petitioner's agents threatened immigrants with the loss of benefits if they did not vote for Petitioner; and objectionable conduct by the Region before and during the polling interfered with employee free choice.

4. Amazon also needs additional time to make a Freedom of Information Act ("FOIA") request on the Board's FOIA Branch in support of its objection regarding the Region's processing of Petitioner's many frivolous unfair labor practice charges against Amazon.

5. This election involves more than 8,300 eligible voters, and voting spanned over 50 polling hours. It is simply infeasible for Amazon to sufficiently investigate the myriad of objectionable conduct within five business days.

6. Amazon respectfully requests an extension of two weeks, until April 22, 2022, to file its offer of proof.

7. Amazon notified counsel for Petitioner regarding the instant motion, but did not receive a response regarding Petitioner's position before the filing.

Respectfully submitted,

HUNTON ANDREWS KURTH LLP

/s/ Kurt Larkin

Kurt Larkin

Riverfront Plaza, East Tower

951 East Byrd Street

Richmond, Virginia 23219-4074

(T): 804-788-8200

(F): 804-788-8218

(E): klarkin@HuntonAK.com

Amber Rogers

Fountain Place

1445 Ross Avenue, Suite 3700

Dallas, Texas 75202-2799

(T): 214-979-3000

(F): 214-880-0011

(E): arogers@HuntonAK.com